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*Counsel for Citibank N.A., as Administrative Agent  
for the Utility Revolving Credit Facility*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION

- and -

# PACIFIC GAS AND ELECTRIC COMPANY.

## Debtors.

- Affects PG&E Corporation
- Affects Pacific Gas and Electric Company
- Affects both Debtors

*\* All papers shall be filed in the Lead Case,  
No. 19-30088 (DM).*

Case No. 19-30088 (DM)

Chapter 11

(Lead Case)

**NOTICE OF CROSS-MOTION OF  
ADMINISTRATIVE AGENT FOR LEAVE  
TO APPEAL ORDER REGARDING  
POSTPETITION INTEREST**

Date: TBD  
Time: TBD  
Judge: TBD

**Objection Deadline:** March 12, 2020

1           **PLEASE TAKE NOTICE** that on January 29, 2019, PG&E Corporation and Pacific Gas  
2 and Electric Company, as debtors and debtors in possession (collective, the “**Debtors**”), in the  
3 above-captioned chapter 11 cases, each filed a voluntary petition for relief under chapter 11 of title  
4 11 of the United States Code with the United States Bankruptcy Court for the Northern District of  
5 California (San Francisco Division) (the “**Bankruptcy Court**”).  
6

7           **PLEASE TAKE FURTHER NOTICE** that, pursuant to 28 U.S.C. § 158(a)(3) and  
8 Federal Rule of Bankruptcy Procedure 8004, Citibank, N.A., as administrative agent (in such  
9 capacity, the “**Administrative Agent**”) under that certain Second Amended and Restated Credit  
10 Agreement dated as of April 27, 2015 (as amended, supplemented or otherwise modified) (the  
11 credit facility governed thereby, the “**Utility Revolving Credit Facility**”) among Pacific Gas and  
12 Electric Company and several lenders from time to time party thereto, filed the *Cross-Motion of*  
13 *Administrative Agent for Leave to Appeal Order Regarding Postpetition Interest* (the “**Cross-**  
14 **Motion**”). The Cross-Motion accompanies the Administrative Agent’s *Notice of Appeal and*  
15 *Statement of Election to Have Appeal Heard by District Court* (the “**Notice of Appeal**”), this notice  
16 of the Cross-Motion, and all the papers and record on file in this action.  
17

18           **PLEASE TAKE FURTHER NOTICE** that the Cross-Motion may be heard by the United  
19 States District Court of the Northern District of California (the “**District Court**”) at a date and  
20 time to be set by the District Court. Pursuant to Federal Rule of Bankruptcy Procedure 8004(c)(3),  
21 however, any relief requested in the Cross-Motion may be granted without a hearing.  
22

23           **PLEASE TAKE FURTHER NOTICE** that, pursuant to Federal Bankruptcy Rule of  
24 Procedure 8004(b)(2) and 8013, any oppositions or responses to the Cross-Motion must be in  
25 writing, filed with the District Court, and served on counsel for the Administrative Agent so as to  
26 be received by no later than **March 12, 2020**. Any oppositions or responses must also be filed and  
27 served on all the parties reflected in the Notice of Appeal.  
28

1           **PLEASE TAKE FURTHER NOTICE** that copies of the Cross-Motion and its supporting  
2 papers can be viewed and/or obtained: (i) by accessing the Bankruptcy Court's website at  
3 <http://www.canb.uscourts.gov>, (ii) by contacting the Office of the Clerk of the Court at 450 Golden  
4 Gate Avenue, San Francisco, CA 94102, or (iii) from the Debtors' notice and claims agent, Prime  
5 Clerk LLC, at <https://restructuring.primeclerk.com/pge> or by calling (844) 339-4217 (toll free) for  
6 U.S.-based parties; or +1 (929) 333-8977 for international parties or by email at:  
7 [pgeinfo@primeclerk.com](mailto:pgeinfo@primeclerk.com). Note that a PACER password is needed to access documents on the  
8 Bankruptcy Court's website.

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11           DATED: March 5, 2020

12           **DAVIS POLK & WARDWELL LLP**

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14           /s/ Timothy Graulich  
15           TIMOTHY GRAULICH  
16           MARC J. TOBAK (*pro hac vice* application  
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17           DAVID SCHIFF  
18           ANDREW D. YAPHE (SBN 274172)

19  
20  
21           *Counsel for Citibank N.A., as Administrative  
Agent for the Utility Revolving Credit  
Facility*